

) SUPERIOR COURT

)

) JUDICIAL DISTRICT OF

) STAMFORD/NORWALK

Plaintiffs,

)

) AT STAMFORD

versus

)

1

PARTNER WEALTH MANAGEMENT, LLC

1

KEVIN G. BURNS, JAMES PRATT-HEANEY,

5

AND WILLIAM P. LOFTUS

5

1

Defendants.

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STATE OF CONNECTICUT)

)

ss. Westport

COUNTY OF FAIRFIELD)

)

JAMES PRATT-HEANEY, being duly sworn, deposes and states:

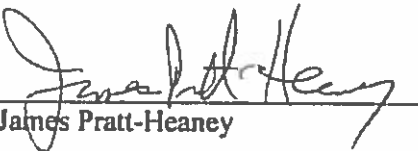
1. I am over eighteen years of age and believe in the obligation of an oath. I am an officer of LLBH Private Wealth Management, LLC ("LLBH"), an affiliated company of the defendant, Partner Wealth Management, LLC ("PWM"). I am a member of PWM. By virtue of my position and role at LLBH and PWM, I have personal knowledge of the statements made herein.

2. I have had several meetings over the past few months with the client referred to in the draft Answer and Counterclaim Complaint as Confidential Client No. 1. Confidential Client No. 1 withdrew nearly all of his assets – approximately \$15.5 million – in May 2015. Because he still maintains some assets with LLBH, I still have regular meetings with him.

3. During one meeting a few weeks ago, Confidential Client No. 1 informed me that Lomas had taken him to dinner and that they watched an NCAA basketball game together in

March 2016.

4. At a subsequent meeting with Confidential Client No. 1, he informed me that Lomas and he played golf together in April 2016. Confidential Client No. 1 also told me that Lomas gave him some home-made pickles.


James Pratt-Heaney

Subscribed and sworn to this 3 day of June, 2016.


Notary Public

